

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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Fareportal Holdings Inc., Fareportal Inc.,	:	
WK Travel, Inc. and Travelong, Inc.,	:	
	:	
Plaintiffs,	:	Case No. 1:21-cv-00061-CBA-LB
	:	
v.	:	
	:	
JetBlue Airways Corporation,	:	
	:	
Defendant.	:	
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**NOTICE OF JETBLUE AIRWAYS CORPORATION'S  
MOTION TO DISMISS THE AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon JetBlue Airways Corporation's Memorandum Of Law In Support Of Its Motion To Dismiss The Amended Complaint; the Transmittal Declaration of Matthew L. Craner, dated April 15, 2021, together with the exhibits attached thereto; as well as all the prior pleadings and proceedings herein, the undersigned, attorneys for Defendant JetBlue Airways Corporation ("JetBlue") in the above-captioned matter, will move the Court, before the Honorable Carol Bagley Amon, United States District Judge for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, on July 7, 2021 at 2:00 PM, for an order pursuant to Federal Rule of Civil Procedure 12(b)(6) dismissing all claims in the Amended Complaint of Fareportal Holdings Inc., Fareportal Inc., WK Travel, Inc. and Travelong, Inc. (collectively, "Fareportal"), dated March 4, 2021 (the "Amended Complaint") with prejudice. In the event that JetBlue's motion to dismiss is granted with respect to Fareportal's antitrust claims, JetBlue also moves the Court for an order pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure dismissing Fareportal's state law claims.

The grounds for this motion are that the Amended Complaint should be dismissed because (i) it fails to state a claim upon which relief can be granted, and (ii) if Fareportal's antitrust claims are dismissed, the Court should decline to exercise supplemental jurisdiction over the state law claims, which should be dismissed pursuant to 28 U.S.C § 1367(c)(3).

DATED: April 15, 2021  
New York, New York

Respectfully submitted,

/s/ Richard F. Schwed

Richard F. Schwed

Matthew L. Craner

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